March 26, 2003

MEMORANDUM

TO: Larry Hartzke
       Department of Health and Family Services

FROM: Janet R. Swandby
          Lobbyist for the Association of Health Information Outsourcing Services (AHIOS)

RE: **Response to Request for Information**

The following are in response to your requests:

1. **Ballpark Hourly Wage**

    The average labor cost for release of patient health information is $21.69/hour (including benefits).

    It should be noted that labor costs do not cover all of the costs associated with providing this service. Other costs to the maintainer of the records would include: supervision of staff, training of staff, equipment, software, insurance, travel, facilities, utilities and more.

2. **Frequency of Various Media**
    Percentage of microfilm and fiche in hospital setting: 15%
    Percentage of microfilm and fiche in clinic setting: 3%

3. **Five Most Time-Consuming Tasks**
    The five most time-consuming tasks are the five most expensive tasks in responding to an average medical record request. The following tasks are the most time-consuming:

    a. Retrieving the actual dates of service needed and the chart. The most powerful myth is that to process a request, staff just pull the medical file off the shelf. Many dates of service needed to fulfill a request are not even in the actual Medical Chart. There might be other departments where staff has to physically go in order to get a date of service. Just some examples are: Physical Therapy, Pain Clinic, Sports Medicine Clinic, Occupational Health, Fit for Work, Occupational Therapy, Speech Therapy. Most often, these departments are located on different floors within a medical facility.

Current dates of service could be within the medical record department in the following areas: incomplete area (missing reports and doctors' signatures), discharge analysis, coding area, and the most dreaded area would be loose filing (Some facilities have two months of services waiting to be filed in the chart. Staff has to physically go through stacks of information looking for the dates of service needed).

Older dates of service are sometimes housed in off-site locations. At these off-site locations, records are stored in boxes which are stacked on top of each other, making it difficult to locate the records needed.

Older dates of service are also available on older technology such as roll film, fiche, and regular microfilm. A requester looking for records from the 1970's and 1980's might find them on roll film where it takes extra time to physically go through the film and search alphabetically by patient name. Then staff has to manually feed the roll film into the machine. Whenever records are retrieved from film, the employee has to sit at the machine and manually print every page. If there is a request that involves 6 older dates of service, staff will have to pull 6 different rolls of film or fiche.

b. Reviewing the record for sensitive information. Most authorizations do not authorize sensitive information to be released such as HIV test results, Mental Health, and AODA. Employees must have a working knowledge of Wisconsin State Statute 252.15, 51.30, and Federal Law 42 CFR. The actual dates of service then must be reviewed to make sure that the sensitive information is not released. For example, in the case of an HIV test that was taken on a patient, the results could be located in many areas besides just the lab test. Employees are trained to screen the discharge summary, history and physical, consultations, doctor orders, doctor progress notes, ACOG record (prenatal record), lab tests, and even the nurses' notes. There might even be HIV test results in the history and physical that was done on a family member that the physician dictated.

C. Invalid authorizations and/or send backs of requests. Around 12% of all requests are sent back due to either an invalid authorization or the requester not having any identifying information for the patient. The invalid authorizations are due to out-of-state requesters not being aware of Wisconsin state laws requiring certain information be on the informed consent. Employees are trained in State Statutes 146.81, 146.82, 146.83, 146.835, and 146.84. A good number of requesters misspell patient names or have the incorrect date of birth on their original request, forcing staff to return the request for more information. All requests that are submitted are manually entered into computer tracking software by patient name, requester name and address, dates of service requested, and dates sent, including number of pages. Every request is entered, and, in the case of a request being sent back, it would get entered a second time.

D. Documentation of information being sent out. Every request is manually entered into computer tracking software by patient name, medical record number, type of authorization, dates of service requested, status of request, type of request, requester

name and address, and whether the information is being shipped by mail or picked up. Wisconsin State Statute 146.82 requires documentation of requests without authorization. With new regulations starting April 14, 2003 HIPAA will also require this documentation. Once the information is ready to be sent, the request is updated in the tracking software as to the specific documents actually being sent.

All requests are also documented on the back of each request with the specific dates of information sent, the specific information copied, the number of pages sent, the date and time sent of each request.

E. <u>Phone calls relating to each request</u>. Phone calls are different for each type of requester. A requester who sends in an APS (applying for life insurance) request (companies such as EMSI, Mediconnect, Lab One, and Scan Tech) calls literally 3-5 times per request. The first call is to verify that the patient received treatment at the facility. The second call is two days after the request is mailed to see if it was received. The third call is to check on its status. Other calls are to see when the requested information was sent and what was sent

Other requesters call to ask why the request was sent back or to change their original request to different dates. Certain attorneys call to provide notification that a request is being faxed. Most often, these attorneys submit a last minute request and need the information immediately for a court date that is imminent.

4. Time for Each of the Most Time-consuming Tasks

Retrieval average for one request: 20 minutes
Reviewing authorizations/send backs: 5 minutes
Reviewing for sensitive information: 10 minutes
Documentation of each request: 10 minutes
Phone call(s) per request: 5 minutes

I hope you find this information useful. Please contact me if you require additional information.

JRS/